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MAY 21 2003

FCC - MAILROOM

May 20, 2003

SENT BY FEDERAL EXPRESS

Marlene H. Dortch, Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: Commercial Radio of Harrison Petition for
FM Rulemaking to Add Allotment of Channel 280A
to Harrison, Michigan as directed to
The Chief, Audio Division, Media Bureau.

Dear Ms. Dortch:

Transmitted herewith is an original and four copies of
the above captioned pleading as directed to the The Chief,
Audio Division, Media Bureau.

It is requested that the additional copy marked "FILE"
be date-stamped and returned to us in the enclosed self-
addressed stamped envelope.

Should any additional information be required, please
contact this office.

Very truly yours,

Robert J. Buenzle, Counsel for
Commercial Radio of Harrison

No. of Copies rec'd 074
List ABOVE
MB 03-98

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of) MM Docket No. ____
)
Amendment of Section 73.202(b)) RM-
Table of Allotments)
FM Broadcast Stations)
Harrison, Michigan)

To: Chief, Audio Division
Allocations Branch
Media Bureau

PETITION FOR RULEMAKING

Commercial Radio of Harrison (hereinafter "CRH"), by its attorney, in accordance with Section 1.401 and 1.420 of the Commission's rules, hereby petitions the Commission for the initiation of a rule making proceeding to amend the FM Table of assignments, Section 73.202 of the Commission's rules, to Allot new FM channel 280A to the city of Harrison, Michigan. In support whereof, the following is submitted:

The city of Harrison, Michigan, is an independent city centrally located in the state of Michigan. At the present time, the FCC table of Allocations shows one channel (221A) already allotted to Harrison and licensed to Xavier University operating noncommercial FM station WVXH. An AM station is also licensed in Harrison to Laurie L. Foster operating as WKKM(AM) 1KW day, 250 watts CH, on 1540Khz. In this Petition, CRH proposes to add an additional FM allotment to provide a commercial FM radio service to Harrison and its surrounding area.

As shown in full detail in the attached exhibit one, Harrison is a community of long-standing with a current population of about 2000 persons in its County of over 35,000 persons, and occupies a prime position in the central Michigan recreational area. Full information on its government, educational and municipal services, health and recreational facilities, as well as its business structure are all contained in Exhibit One and clearly demonstrate Harrison's qualifications and need for a second FM channel allotment as proposed herein.

Also attached hereto is an Engineering Allocation Study and site map which indicates that the new requested channel for Harrison may be added to the Allocation Table fully consistent with all FCC spacing and interference rules without any other change being required in any other station or allocation. CRH also submits here its unqualified commitment to apply for use of the channel if allocated and upon grant of that application to diligently proceed to build and operate a station on that channel.

In sum, it is respectfully submitted that adoption of this Petition would be in the public interest in providing an additional FM service to the city of Harrison in furtherance of the Commission's stated goal of providing the greatest possible service to the public. See generally, Implementation of BC Docket 80-90 to Increase the Availability of FM Broadcast Assignments, 57 RR 2d 863, 865 (1985). It is therefore requested that the Table of Allocations be modified as follows:

City	Present	Proposed
Harrison, Michigan	221A	221A, 280A

Wherefore, it is respectfully submitted that the instant
Petition for Rulemaking is in the public interest and should be
adopted.

Respectfully Submitted,

COMMERCIAL RADIO OF HARRISON

by 

Robert J. Buenzle

Its Counsel

Law Offices
Robert J. Buenzle
11710 Plaza America Drive
Suite 2000
Reston, Virginia 20190

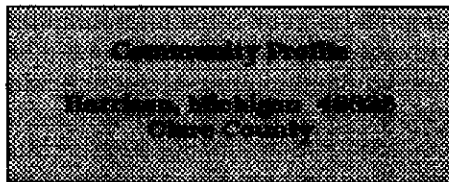
(703) 430-6751

May 20, 2002

Commercial Radio Of Harrison
Petition for FM Rulemaking
May 20, 2003

Exhibit 1

COMMUNITY DATA



Harrison is a rural community that has been growing steadily for the past 40 years. Located centrally in the State, Harrison is close to both cities and undeveloped woodlands, making it an ideal location for those who must work in the city but who want to live near the lakes.

Harrison is also an ideal place for a variety of industries: manufacturing, retail, tourism, service, education, construction, and government. The Harrison Area Economic Development Corporation works to promote growth in the Harrison area and is available to offer advice and assistance to commercial enterprises considering a move to the Harrison community.

Best of all, Harrison is large enough to offer everything that is needed, while being small enough to provide personal attention and service. Unlike the big cities, Harrison is still a place where you can feel as if "everybody knows your name!"

Miles from:

Clare	15
Gladwin	16
Houghton Lake	23
Mt. Pleasant	27
Cadillac	43
Midland	47
Grayling	47
Big Rapids	69
Gaylord	75
Traverse City	72
Lansing	94
Detroit	175
Toronto	270
Chicago	300
Cleveland	320

Municipal Services

Form of Government: Mayor/City Council
 Volunteer Fire Department
 Police: Clare County Sheriff's Department
 30 Sworn Officers, 45 Reserves
 Includes Marine Officers
 Rubbish Service: Waste Managment, Inc.
 Comprehensive City Plan: Complete
 Zoning: Community
 Public Library: Yes

Educational Facilities

Harrison Community Schools
 Schools: 1 HS, 1 MS, 3 Elementary
 Teachers: 124
 Enrollment: 2360
 Mid Michigan Community College
 Harrison and Mt.Pleasant campuses
 Central Michigan University: Mt.Pleasant
 Kirtland College: Roscommon
 Northwood Institute: Midland
 Delta College: Saginaw
 Saginaw Valley State University: Saginaw

Utilities

Electric: Consumers Energy
 Natural Gas: Michigan Consolidated Gas
 Telephone: Ameritech
 Source of City Water: 3 Municipal Wells
 Capacity of Plant: 1,000,000 gal/day
 Storage Capacity: 100,000 gal elevated
 Water Hardness: 195
 Sewage Treatment: Oxidation Lagoon

Transportation

Major Highways: US-27 & M-61
 Bus Line: Clare County Transit
 Rail Lines: None
 Number of Motor Freight (one local): 13
 UPS: Yes
 Nearest Airport: Harrison/Clare County
 Runway Length: 3200 feet, lighted
 Surface: Asphalt
 Nearest Commercial Airport:
 MBS (Tri-City) Airport, Saginaw
 Capital City Airport, Lansing

Population	Community	County
1960 Census	1072	11,647
1970 Census	1460	16,697
1980 Census	1700	23,822
1990 Census	1835	24,952
2000 Projection	2000	35,600

Parks

Saxton Park---fishing area; portable toilets
 City Park---picnicking, pavilions, tennis courts, playground areas, restrooms
 Wilson State Park---picnicking, tent and RV camping sites, beach, store, restrooms, no boat launch
 Location of Parks---Harrison City Limits
 Parks w/Utilities---Wilson State Park
 Total Acreage: 80

Community Living

Number of Dwellings: 1127
 Owner Occupied: 50%
 Rental Housing: Yes
 Rental Apartments: Yes
 Retail Establishments: 275
 Wholesale Establishments: 2

Financial Institutions Area Branches

Chemical Bank Michigan: 14
 National City Bank of Michigan/Illinois: 5

Location Services

Harrison Area Chamber of Commerce
 Office Manager: Sharon Hill
 PO Box 682
 809 N. First Street
 539-6011

Harrison Area Economic Development Corporation (HAEDCO)
 539-6310

Major Employers

Firms	Product/Service	Number Employed
Mid Michigan Community College	Educational	550+
MidMichigan Medical Center--Clare	Hospital	300
Harrison Community Schools	Educational	247
Waste Managment of Central MI	Disposal/Recycling	125
Clare County Building	Government	120
Ashcraft's Market	Grocery	105
Federal Broach	Machine Shop	64
Northland IGA	Grocery	60
Family Independence Agency	Government	52
McDonald's of Harrison	Restaurant	50
Sunrise Convenience Stores	Convenience Store	45
Camp Deer Trails	Girl Scout Camp	33
Region 7B	Government	29

Weldon's Transit Mix	Concrete Construction	27
Harrison Lumber Do-It Center	Lumber Company/Hardware	24
US Postal Service--Harrison	Mail Delivery	23
MidMichigan Visiting Nurse Service	Support Services	23
Snow Snake Ski & Golf	Ski Resort/Golf Course	20
Walraven's Country Garden	Farm/Fruit Market	20

Some Things to Consider about Boating:

The legal alcohol limit for boating is exactly the same as the limit for driving a motorized vehicle, but beware of the fact that water can magnify the intoxicifying effects of alcohol, making you feel more inebriated on a boat than on land. Children under 6 must wear a Coast Guard approved life jacket at all times when in a boat, and everyone should be seated whenever the boat is underway. Boats on Clare County Lakes must be inspected by the Sheriff's Marine division, and both Sheriff's Marine Officers and DNR Officers can issue tickets for boating violations. Remember that the laws for operating a personal watercraft (PWC) changed in 1999; be sure you know what is required and prohibited before launching your PWC. If you don't know Michigan boating laws, call the Sheriff's Office at 539-7166 for a free brochure. Be safe!

Harrison, Michigan Phone List

Ambulance	539-6331/911
Sheriff's Department	539-7166
Fire Department	539-7145
City Hall	539-7145
City Clerk (Jack McNutt)	539-7145
City Treasurer (Tracey Beadle)	539-7145
Harrison Area Chamber of Commerce	539-6011
Library	539-6711

Clare County	
Animal Control	539-3221
Building Inspector	539-2741
Board of Commissioners	539-7436
Burning Permits	539-1212
Cooperative Extension	539-7805
County Abstract Office	539-7131
County Clerk	539-7131
County Surveyor	539-2540
4-H/Home Economics	539-7430
Dept of Natural Resources	539-6411
Dept of Social Services	539-4260
District Court	539-7173
Electrical Inspector	539-2351
Fairgrounds Office	539-9011
Health Department	539-6731
Housing Commission	539-2761
Probate Court	539-7109
Prosecuting Attorney	539-9831
Register of Deeds	539-7131
Road Commission	539-2151

Tax Equalization	539-7894
Treasurer	539-7801
U. S. Post Office	539-3100
Veteran's Affairs	539-3273
Police/Fire/Ambulance/Emergency	911

Civic Groups and Organizations	
Alcoholics Anonymous	539-6899
American Legion Post #404	539-9792
Big Brothers/Big Sisters	539-9304
Budd Lake Area Association	539-7172
Boy Scouts	539-4082
Clare County Crazy Quilters	539-7819
Clare County Red Cross	386-0200
Girl Scouts	539-6351
Habitat for Humanity	539-6203
Harrison Area Chamber of Commerce	539-6011
Harrison Business & Professional Women's Club	386-6636
Harrison OES Chapter 408	539-9096
Harrison Community Squares	539-2868

Harrison Eagles Aerie #5441	539- 2232
HAEDCO	539- 6310
Harrison Moose Lodge #2235	539- 1501
Harrison Snowriders	539- 4394
Harrison Sportsman's Club	539- 1825
Harrison Women's Club GFWC	539- 2430
Kiwanis Club of Harrison	539- 3071
Knights of Columbus #7571	539- 6515
Lion's Club of Harrison	539- 6441
Lioness of Harrison	539- 6441
MSU Extension Service	539- 7805
The Salvation Army	539- 3235
Senior Citizen Services	539- 5161
Twenty Lakes Antique Tractor Club	588- 2552
VFW Post #1075	539- 6172
Women's Aglow	539- 4046

Medical Services and Facilities

HOSPITAL: MidMichigan Medical Center—Clare

64-bed acute care hospital; emergency room services
104 West Sixth Street (corner of McEwan and Sixth Street)
Clare, MI 48617
(517) 386-9951

OFFICES: MidMichigan Medical Offices—Harrison

815 North Clare Avenue (on Business 27 next to Central Michigan Mental Health Services)
Harrison, MI 48625
(517) 539-2114

URGENT CARE: MidMichigan Urgent Care—Clare

700 West Fifth Street (open 7 days per week; between McGuire Chevrolet and Gateway Chrysler)
Clare, MI 48617
(517) 386-9911

PHYSICAL THERAPY: MidMichigan Rehabilitation Services—Harrison

456 S. First Street
Harrison, MI 48625
(517) 539-0230

Family Practice
Internal Medicine
Obstetrics/Gynecology
General Surgery
Urology
Emergency Medicine
Pediatrics
Urgent Care/Occupational Medicine
Podiatry
Orthopedic Surgery
Behavioral Medicine
Otolaryngology (Ear, Nose and Throat)
Neurology
Oncology
Physical Medicine and Rehabilitation
Psychiatry
Rheumatology

[Back to Main Page](#)

Four Seasons Recreation



Harrison offers a variety of recreational activities within a 30-mile radius of town:

Tamarack's and Snow Snake Golf Courses

Miniature golf, batting cages and go-karts at Putt-R-Golf

Soaring Eagle Casino in Mt. Pleasant

Canoeing, tubing and kayaking at Duggan's Canoe Livery

Bowling at Snowbird Lanes

Camping at Countryside, Duggan's and Hidden Hill campgrounds

Downhill and cross-country skiing at Snow Snake

Amish furniture stores, bakeries, and quilt shops

Boat rentals at Snug Haven Lakeside Resort and at Lakeside Motel on Budd Lake

Lake access, camping and sandy beach at Wilson State Park on Budd Lake

Hiking, cycling and ORV trail riding in the surround State land

Picnicking, tennis, and relaxing in the City Park

Fishing off the "Power Dock" at Saxton Park or on the ice in winter

Clare County Fair in August--grandstand with top-name performers, rides/games, livestock

Auctions just about every weekend, from antiques to farm equipment to color televisions

Harrison weekend Flea Market across from Wilson State Park

Holiday Craft Shows

Memorial Day Car Show

Hunting for deer, birds and even wild turkey in the surround State-owned lands

Morel hunting



(More than) 20 Lakes in 20 Minutes

LAKE NAME	RAMP	TOILETS	FISH SPECIES	ACRES
S=ARNOLD LAKE	2	NONE	BASS, WALLEYE,	118
BEEBE LAKE	PRIVATE	PRIVATE	PANFISH N/A	
BERTHA LAKE	N/A	N/A	PIKE, BASS, PANFISH	40
BLUE GILL LAKE	N/A	NONE	PIKE, BLUEGILL, PERCH	14
BOOTHOUSE	N/A	NONE	PANFISH	40
LAKE BUDD LAKE	1	PARK, H/C	MUSKY, BASS, TROUT,	175
CANADA LAKE	N/A	N/A	PERCH PANFISH	
S=CRANBERRY	2	H/C	BASS, PIKE, PANFISH	106
LAKE	2	YES	BASS, PIKE, PANFISH	264
S=CROOKED	N/A	N/A	BASS, PIKE, PERCH,	
LAKE DEER LAKE	N/A	N/A	PANFISH BASS, PIKE,	
DODGE LAKE	PRIVATE	PRIVATE	PERCH, PANFISH PIKE,	110
ELBOW LAKE	N/A	N/A	BASS, PANFISH	
FINLEY LAKE	2	YES	BASS, PERCH, BASS,	45
S=FIVE LAKES	2	YES	SUNFISH PERCH,	142
S=LAKE GEORGE	N/A	N/A	BLUEGILL, SUNFISH	134
GRASS LAKE	PRIVATE	PRIVATE	BASS, PIKE, PERCH,	
HALF MOON	PRIVATE	PRIVATE	SUCKERS BASS, PERCH,	
LAKE HASKELL	N/A	N/A	BLUEGILL CRAPPIE,	36
LAKE	2	YES, H/C	PERCH, PIKE	30
ICEHOUSE LAKE	2	YES, H/C	BASS, PIKE, BASS,	
S=LILY LAKE	2	YES, H/C	BLUEGILL PANFISH	209
S=LITTLE LONG	N/A	N/A	BASS, PIKE, PERCH,	43
LAKE S=LONG	2	NONE	SUNFISH TROUT, BASS,	210
LAKE	3	YES	PIKE, BLUEGILL PIKE,	
MCWATTY LAKE	N/A	N/A	BASS, BLUEGILL	
S=NESTOR LAKE	N/A	NONE	PANFISH	15
S=PERCH LAKE	N/A	N/A	BASS, PIKE	50
SAND LAKE	N/A	NONE	BASS, PIKE, PANFISH	
SHINGLE LAKE	N/A	NONE	PANFISH	
SILVER LAKE	N/A	NONE	PIKE, BASS	70
SUTHERLAND	N/A	N/A	PIKE, TROUT, BASS,	
LAKE TOWNLINE	N/A	N/A	BLUEGILL BASS, PIKE,	
LAKE TUOHY	2	YES, H/C	BLUEGILL	
LAKE			BASS, PANFISH, SUNFISH	
E. TROUT LAKE			PANFISH	
W. TROUT LAKE			TROUT, BASS, SUNFISH	
S=WINDOVER			TROUT, PANFISH	
LAKE			PIKE, BASS, TROUT	50

S=State Facility/Public Access

H/C=Handicap Restroom Facilities

RAMP CODE:

1. Hard surface ramp with sufficient water depth to accommodate most trailerable boats.
2. Hard surface ramp, limited water depth, where launching large boats may be difficult.
3. Gravel surface ramp.
4. Carry down launch suitable for car top boats and canoes only.



Wilson State Park History

On March 17, 1900, Mr. William Wilson of Wilson Brothers Lumber Company deeded 40 acres of beautiful woodland on the banks of Budd Lake to the City of Harrison to be used as a park. Wilson State Park is bordered by Townline Road to the north and Business 27/Clare Ave. to the west. The entire eastern border of the park is created by Budd Lake, located almost entirely within the city. The entrance to the park is on Business 27. This parcel was conveyed on March 11, 1922, from the City of Harrison to the State of Michigan. The park was under both City and State contract until 1927, when it was redeeded to the State for use as a State park. It has been known as Wilson State Park since then.

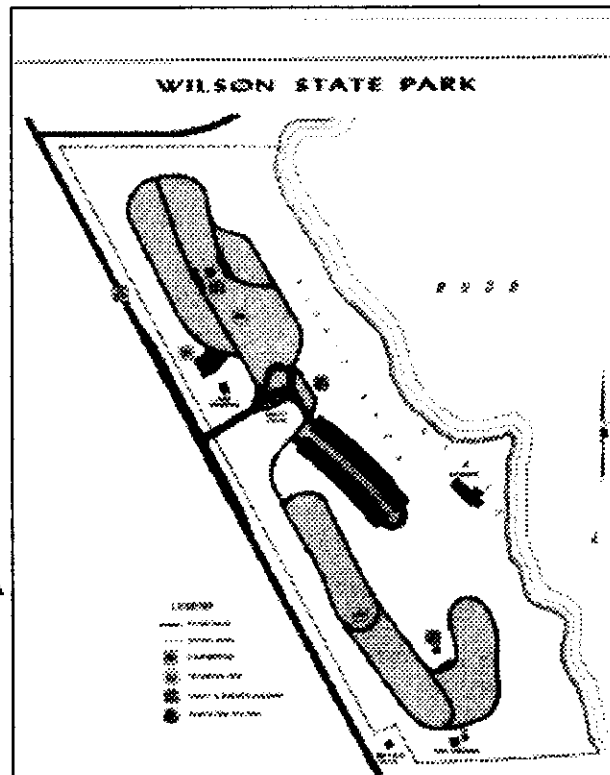
In 1939, a Conservation Corp crew constructed the main park building, which is still used today. They also built a stone residence with rock from Clare, Missaukee and Gladwin counties. Construction was completed in 1941. The north end campground restroom building, constructed in 1952, was remodeled in 1979. The south building was built in 1954 and remodeled in 1982. The park office and shop were added in 1960.

Today the park provides 160 shaded campsites with electrical access and a youth organizational camp site that will accommodate approximately 25 young people. A mini cabin added in 1993 houses four persons, and a tepee located at the entrance to the park is available to rent. A seasonal sanitation station, two playgrounds, and picnic areas are nearby. The wide, sandy beach borders a well-marked swimming area in Budd Lake, which is protected from boating traffic with swim buoys.

There are no public docks in the park, but boaters are permitted to beach their watercraft temporarily at the far ends of the park property. Parts of the park shoreline have been left undeveloped, making those areas excellent fishing spots for anglers who don't have access to a boat. Deep water is just a cast away, and Budd Lake is known throughout the state of Michigan as the best musky fishing site north of Lake St. Clair. (The bass are rather large, too!)

The park is within easy walking distance of the Clare County Fairgrounds, making it a busy facility during Fair Week. That week, a campsite in Wilson State Park provides easy access to a variety of exhibits, a bustling midway, exciting rides, fireworks, and extraordinary concerts. An open-air flea market is also an easy walk away, as are a variety of stores and restaurants.

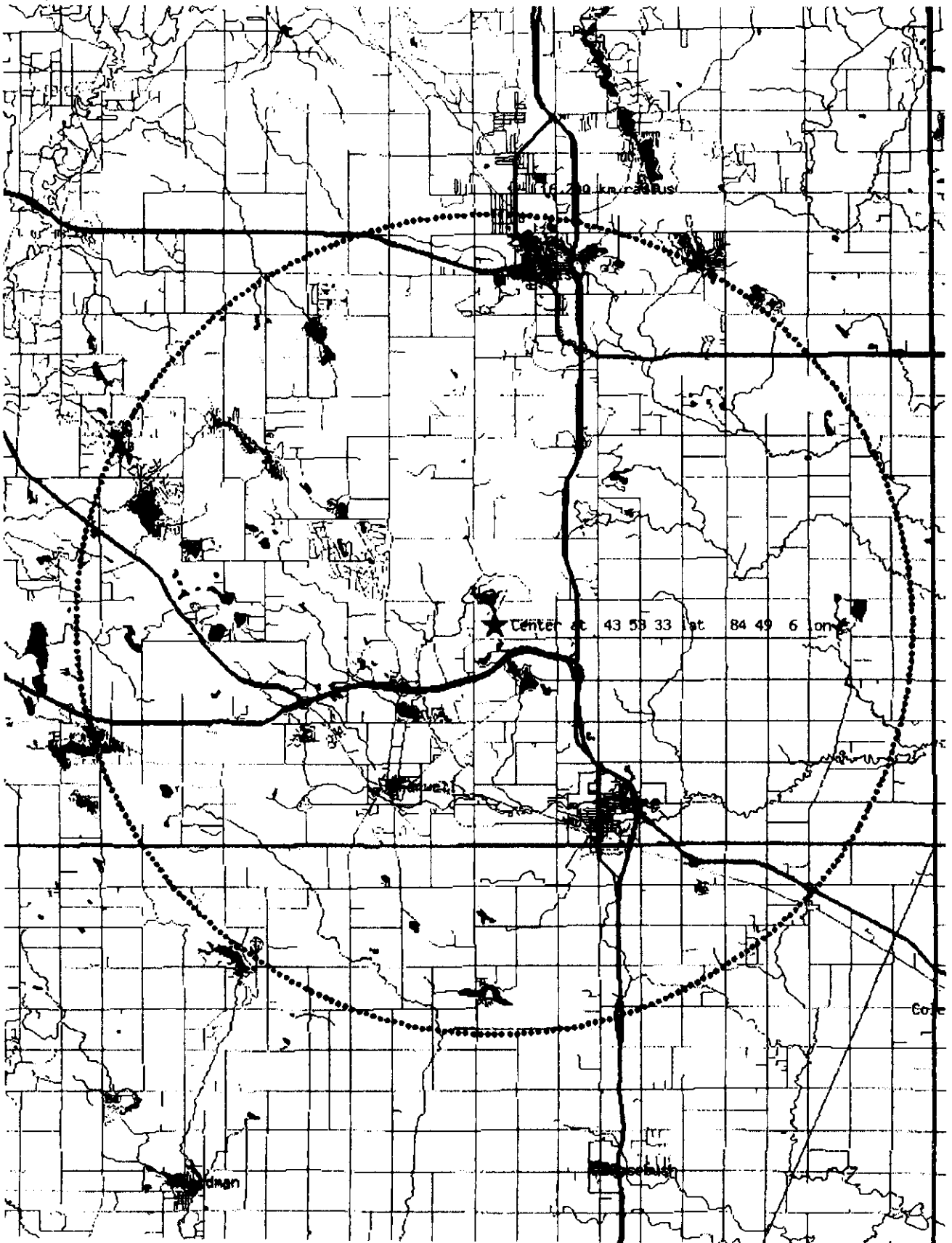
Both RV and tent camping are available year-round, with the park generally full on weekends in July and August. Reservations are recommended. Write the park directly at Wilson State Park, 910 First Street, Harrison, Michigan 48625 or call one of the State Park reservation numbers: (517) 386-4067 or (800) 543-2937. Wilson State Park may be phoned directly at (517) 539-3021.



Commercial Radio Of Harrison
Petition for FM Rulemaking
May 20, 2003

Exhibit 2

ENGINEERING DATA

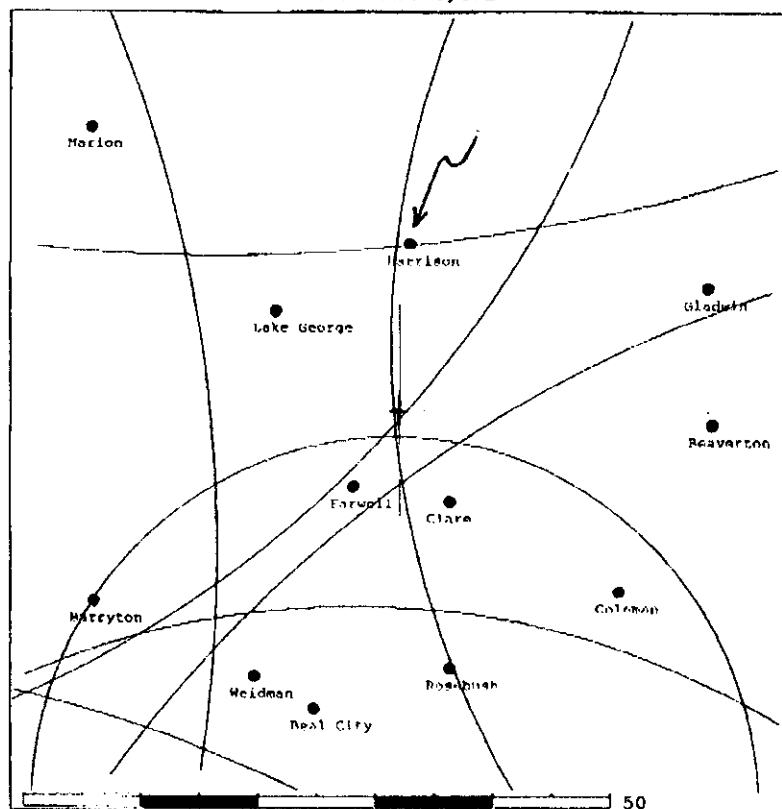


NEW 280A Harrison,MI Ch.Study
Harrison,MI

FMCONT^(TM) LOCATE STUDY

Ch 280 A
103.9 MHz

N. Lat. 43 53 33
W. Lng. 84 49 06



Scale = 1:603,469

V-Bull Comm 9

Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
WSAG	281A	LIC	Pinconning	MI	71.51	85.4	72.0	-0.49
WTCMFM	278C*	LIC	Traverse City	MI	94.51	312.1	95.0	-0.49
WCZYFM	282A	LIC	Mount Pleasant	MI	33.16	180.8	31.0	2.16
WRSR	280A	LIC	Owosso	MI	120.01	146.0	115.0	5.01
WCMWFM	280C2	LIC	Harbor Springs	MI	179.65	354.8	166.0	13.65
ALLO.V	280A	VAC	Pentwater	MI	131.08	264.8	115.0	16.08
ALLO.V	279A	VAC	Hubbardston	MI	88.35	182.5	72.0	16.35
WVGR	281B	LIC	Grand Rapids	MI	145.22	202.9	113.0	32.22
WKQZ	227C2	LIC	Midland	MI	58.60	94.8	15.0	43.60
WCZE.C	279C2	CP -Z	Harbor Beach	MI	152.78	97.8	106.0	46.78
WSNXFM	283B	LIC	Muskegon	MI	124.18	232.3	69.0	55.18
WILZ	283A	LIC N	Saginaw	MI	91.05	127.4	31.0	60.05
WQLB	277C3	LIC-Z	Tawas City	MI	111.94	58.4	42.0	69.94
RADD	282C3	ADD	Atlanta	MI	116.73	23.5	42.0	74.73